

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, *et al.*, individually and on
behalf of others similarly situated,

Plaintiffs,

v.

OPEN AI INC., OPENAI OPCO LLC, OPENAI
GP LLC, OPENAI, LLC, OPENAI GLOBAL
LLC, OAI CORPORATION LLC, OPENAI
HOLDINGS LLC, OPENAI STARTUP FUND I
LP, OPENAI STARTUP FUND GPI LLC,
OPENAI STARTUP FUND MANAGEMENT
LLC, and MICROSOFT CORPORATION,

Defendants.

ECF CASE

No. 1:23-cv-08292-SHS

JONATHAN ALTER, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI,
LLC, OPENAI OPCO LLC, OPENAI GLOBAL
LLC, OAI CORPORATION, LLC, OPENAI
HOLDINGS, LLC, and MICROSOFT
CORPORATION,

Defendants.

No. 1:23-cv-10211-SHS

[PROPOSED] SCHEDULING ORDER

1. FACT DISCOVERY

- a. Substantial production of documents for all RFPs served by January 29, 2024, shall be completed by June 14, 2024.
- b. Fact discovery shall be completed by September 17, 2024.

2. **EXPERT DISCOVERY**

- a. Expert Reports on issues on which a party has the burden of proof shall be served by October 18, 2024.
- b. Opposing Expert Reports shall be served by November 18, 2024.
- c. Expert discovery shall be completed by December 9, 2024.

3. **MOTIONS FOR SUMMARY JUDGMENT**

- a. Motions for Summary Judgment and *Daubert* Motions shall be filed by January 7, 2025.
- b. Opposition to Motions for Summary Judgment and *Daubert* Motions shall be filed by February 7, 2025.
- c. Replies in support of Motions for Summary Judgment and *Daubert* Motions shall be filed by February 28, 2025.

Entered this ____ day of _____, 2024

SO ORDERED.

The Honorable Sidney H. Stein
UNITED STATES DISTRICT JUDGE